

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ALBERTO GUERRERO MARTE )  
 a/k/a Deivi, )  
 SANTOS GUERRERO MORILLO )  
 a/k/a Elvin, a/k/a Kevin, )  
 a/k/a Pedro Oscar Rojas, )  
 MICHELL DEJESUS, )  
 FNU LNU a/k/a Luis Rodriguez Lugo, )  
 a/k/a Boss, )  
 FNU LNU a/k/a Maribel Santiago-Ramos, )  
 a/k/a La Cuna, a/k/a Miguelina, )  
 ALLISON DEJESUS, )  
 JONALY DEJESUS, )  
 ALLAN RAYMOND PIMENTEL, )  
 FNU LNU a/k/a Alexis Garcia, )  
 FNU LNU a/k/a Wilkins Bertre, )  
 a/k/a El Barbero, )  
 HEIBRAHIM DELVALLE BAEZ )  
 a/k/a Nato, )  
 ALFREDO GONZALEZ )  
 a/k/a Aguadillo, )  
 QUERZON BAEZ, )  
 PEDRO CARLOS VICENTE GUERRERO )  
 a/k/a/ Omar Camacho, a/k/a Bunguito, )  
 FNU LNU a/k/a Tony, a/k/a Edward Garcia, )  
 a/k/a Eric Guerrero, and )  
 FNU LNU a/k/a Todolindo, a/k/a El Lindon, )  
 a/k/a Lindy, a/k/a Jose Pimentel )

No. 1:16-cr -162-01/16-PB

## INDICTMENT

## The Grand Jury charges:

## COUNT ONE

**[Conspiracy to distribute and to possess with intent to distribute controlled substances]  
[21 U.S.C. §§ 846, 841(a)]**

Beginning on or about an unknown date, but at least by 2013, and continuing to at least on or about October 12, 2016, in the District of New Hampshire and elsewhere, the defendants,

**ALBERTO GUERRERO MARTE a/k/a Deivi,**

**SANTOS GUERRERO MORILLO a/k/a Elvin, a/k/a Kevin, a/k/a Pedro Oscar Rojas,**

**MICHELL DEJESUS,**

**FNU LNU a/k/a Luis Rodriguez Lugo, a/k/a Boss,**

**FNU LNU a/k/a Maribel Santiago-Ramos, a/k/a La Cuna, a/k/a Miguelina,**

**ALLISON DEJESUS,**

**JONALY DEJESUS,**

**ALLAN RAYMOND PIMENTEL,**

**FNU LNU a/k/a Alexis Garcia,**

**FNU LNU a/k/a Wilkins Bertre, a/k/a El Barbero,**

**HEIBRAHIM DELVALLE BAEZ a/k/a Nato,**

**ALFREDO GONZALEZ a/k/a Aguadillo,**

**QUERZON BAEZ,**

**PEDRO CARLOS VICENTE GUERRERO a/k/a/ Omar Camacho, a/k/a Bunguito,**

**FNU LNU a/k/a Edward Garcia, a/k/a Tony, a/k/a Eric Guerrero, and**

**FNU LNU a/k/a Todolindo, a/k/a El Lindon, a/k/a Lindy, a/k/a Jose Pimentel**

knowingly and intentionally combined, conspired, confederated and agreed with each other, and with other persons known and unknown to the Grand Jury, to distribute, and possess with intent to distribute, controlled substances, including one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

Alberto Guerrero Marte's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

Santos Guerrero Morillo's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

Michell DeJesus's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

FNU LNU a/k/a Luis Rodriguez Lugo's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

FNU LNU a/k/a Maribel Santiago-Ramos's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

Heibrahim Delvalle-Baez's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

Alfredo Gonzalez's conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(b)(1)(A).

All in violation of 21 United States Code, Sections 846, 841(a), and 841(b)(1)(A).

A TRUE BILL

/s/ Foreperson  
Grand Jury Foreperson

EMILY GRAY RICE  
United States Attorney

/s/ Georgiana L. Konesky  
Georgiana L. Konesky  
Assistant U.S. Attorney

Dated: October 5, 2016